

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 2:22-cv-04027-MDH
)	
JOHN HUGO EICKHOFF, JR.,)	
RHONDA KAY EICKHOFF,)	
HOFFMAN ASSOCIATES, LLC,)	
ARIC ELLIOT SCHREINER,)	
COLUMBIA CPA GROUP LLC,)	
JOHN WILLIAM GRAY II, and)	
DAMON THOMAS EISMA, individually)	
and d/b/a DAMON T. EISMA)	
ATTORNEY AT LAW,)	
)	
Defendants.)	

**MOTION TO WITHDRAW AS LEGAL COUNSEL FOR
DEFENDANT HOFFMAN ASSOCIATES, LLC**

Undersigned counsel Andrew W. Blackwell and Sara G. Neill, move the Court to allow them to withdraw from their representation of Defendant Hoffman Associates, LLC (“Hoffman”). In support of their Motion, undersigned counsel states:

1. On May 9, 2022, undersigned counsel entered their appearance for Defendant Rhonda Kay Eickhoff. (Docs. 19 and 20).
2. On May 10, 2022, undersigned counsel entered their appearance for Hoffman (Docs. 23 and 24) for the limited purpose of filing an “Unopposed Motion for Extension of Time” to respond to Plaintiff United States of America’s “Amended Complaint” to avoid a default judgment. (Doc. 25).
3. At the time, undersigned counsel was attempting to determine whether their client, Rhonda Kay Eickhoff, was the legal owner of Hoffman.

4. The Court granted undersigned counsel's "Unopposed Motion for Extension of Time", extending the time to respond to June 9, 2022. (Doc. 26).
5. On June 6, 2022, undersigned counsel filed Hoffman's "Second Unopposed Motion for Extension of Time to Respond to Plaintiff's Amended Complaint." (Doc. 32). The Court granted the motion and extended the time to respond to July 11, 2022. (Doc. 35).
6. Since the Court's June 6, 2022, Order, undersigned counsel has determined Rhonda Kay Eickhoff does not have a legal ownership interest in Hoffman.
7. Undersigned counsel is unable to represent Hoffman in this matter and therefore seeks to withdraw as its legal counsel.
8. Undersigned counsel will continue their representation of Defendant Rhonda Kay Eickhoff.

WHEREFORE, undersigned counsel respectfully requests that the Court allow them to withdraw as counsel for Hoffman Associates, LLC.

Respectfully submitted,

**CAPES, SOKOL, GOODMAN &
SARACHAN, P.C.**

By: /s/ Sara G. Neill
Sara G. Neill, #53053 (MO)
Andrew W. Blackwell, #64734 (MO)
8182 Maryland Avenue, Fifteenth Floor
St. Louis, Missouri 63105
314-505-5418 (Phone)
314-505-5419 (Facsimile)
neill@capessokol.com
blackwell@capessokol.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served by filing a copy of the same with the Court's electronic filing system this 24th day of June, 2022.

/s/ Sara G. Neill